

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

FRANK SACO,

*

C.A. NO.: 03-12551-MBB

*

Plaintiff,

*

*

v.

*

*

TUG TUCANA and

*

TUG TUCANA CORPORATION

*

*

Defendants.

*

PLAINTIFF'S EXPERT DISCLOSURE

The plaintiff submits this expert witness disclosure pursuant to Fed.R.Civ.P 26(a)(2) and the court's order, dated March 31, 2005, and hereby designates his expert witness as follows:

Mr. Joseph Lombardi
Marine Surveyor & Consultant
Ocean Technical Services
P.O. Box 1576
10 Washington Street
Manchester, MA 01944
Office: (978) 526-1894

With respect to Mr. Lombardi's proposed expert testimony, please find as follows: (1) Mr. Lombardi's signed report, dated May 25, 2005; (2) Mr. Lombardi's Curriculum Vitae, which includes his qualifications; (3) a list of Mr. Lombardi's deposition and trial expert testimony; and Mr. Lombardi's fee schedule attached as *PDF File 1*.

Mr. Lombardi is expected to testify concerning the cause of the Plaintiff's injuries, the unseaworthy conditions that existed aboard the Tug TUCANA on the date of injury, and the defendants' negligence.

The Plaintiff reserves the right to supplement or amend its expert designation.

I hereby certify that a true copy of the
above document was electronically
served upon each attorney of record
on June 15th 2005.

Respectfully submitted,
By his attorneys,

/s/ David B. Kaplan

DAVID B. KAPLAN, ESQUIRE

BBO NO. 258540

THE KAPLAN/BOND GROUP

88 Black Falcon Avenue, Suite 301

Boston, MA 02210

(617) 261-0080

(617) 261-1558 Fax

Dated: June 15, 2005